



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

OMAR J. SIDDIQI
Senior Counsel
E-mail: osiddiqi@law.nyc.gov
Phone: (978) 994-1217
Fax: (212) 356-3509

April 19, 2023

BY ELECTRONIC MAIL

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York

Re: Bredder v. The City of New York, et al.,
22 Civ. 4293 (VSB)

Your Honor:

I am the Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, assigned to the defense of defendants City of New York, Captain Delgado, and Officer Schivek ("City defendants") in the above-referenced matter. The parties write jointly in response to the Court's Order dated April 19, 2023 (Dkt No. 20). The parties write jointly to respectfully request that the Court: (1) extend defendants' deadline to answer, *nunc pro tunc*, from April 17, 2023, to May 2, 2023; and (2) refer this matter to Magistrate Judge Aaron for the purpose of scheduling a settlement conference.

As an initial matter, defendants apologize to the Court for not filing a responsive pleading by April 17, 2023. The parties have been having mutual conversations for the last few weeks about the future of this matter and the settlement potential of this matter. The undersigned failed to calendar the deadline to file the answer in this matter after the Court issued its April 4, 2023 Order, and apologizes to the Court for that mistake. Plaintiffs do not wish to seek a default judgment, but rather, to try to work with defendants to attempt to reach a resolution in this matter. To that end, the parties jointly request that the Court allow defendants until May 2, 2023 to file an answer in this matter; the extension is needed because defense counsel is currently out of the office for the end of Ramadan. The parties also respectfully request that this matter be referred to Magistrate Judge Aaron so that the parties may attempt to resolve this matter at a settlement conference.

Thank you for your consideration of this request.

Respectfully submitted,

Omar J. Siddiqi /s/

Omar J. Siddiqi, Esq.

Senior Counsel

cc: BY ECF
Elena Cohen, Esq.